

[REDACTED]

Daniel Cloke Esq.
Group Human Resources Director
News International
1 Virginia Street
London E198 1HR

March 2, 2007

[REDACTED]

Dear Mr Cloke,

Re.: Notice of termination of employment

I refer to Les Hinton's letter of February 5, 2007 informing me of my dismissal for alleged gross misconduct.

The letter identifies the reason for the dismissal as "recent events". I take this to mean my plea of guilty to conspiracy to intercept the voicemail messages of three employees of the royal family.

I am appealing against this decision on the following grounds:

i The decision is perverse in that the actions leading to this criminal charge were carried out with the full knowledge and support of [REDACTED] Payment for Glen Mulcaire's services was arranged by [REDACTED]

ii The decision is inconsistent, because [REDACTED] and other members of staff were carrying out the same illegal procedures. The prosecution counsel, the counsel for Glen Mulcaire, and the Judge at the sentencing hearing agreed that other News of the World employees were the clients for Mulcaire's five solo substantive charges. This practice was widely discussed in the daily editorial conference, until explicit reference to it was banned by the Editor. As far as I am aware, no other member of staff has faced disciplinary action, much less dismissal.

iii My conviction and imprisonment cannot be the real reason for my dismissal. The legal manager, Tom Crone, attended virtually every meeting of my legal team and was given full access to the Crown Prosecution Service's evidence files. He, and other senior staff of the paper, had long advance knowledge that I would plead guilty. Despite this, the paper continued to employ me. Throughout my suspension, I was given book serialisations to write and was consulted on several occasions about royal stories they needed to check. The paper continued to employ me for a substantial part of my custodial sentence.

iv Tom Crone and the Editor promised on many occasions that I could come back to a job at the newspaper if I did not implicate the paper or any of its staff in my mitigation plea. I did not, and I expect the paper to honour its promise to me.

v The dismissal is automatically unfair as the company failed to go through the minimum required statutory dismissal procedures.

Yours sincerely,

Clive Goodman

cc Stuart Kuttner, Managing Editor, News of the World
Les Hinton, Executive Chairman, News International Ltd